

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, LAW DIVISION

SHANNON O'BRIEN,)
)
 Plaintiff,)) No.: 2023L011612
 v.)
)
 FRONTIER AIRLINES, INC., d/b/a)
 FRONTIER AIRLINES,)
)
 Defendants.))

PLAINTIFF'S RESPONSES TO DEFENDANT'S
FIRST SET OF REQUESTS TO ADMIT

1. Admit that you are a citizen of the state of Illinois.

RESPONSE: ADMIT

2. Admit that you are domiciled in the state of Illinois.

RESPONSE: ADMIT

3. Admit that the amount in controversy in this matter exceeds seventy-five thousand dollars (\$75,000), exclusive of interest and costs.

RESPONSE: Pursuant to Illinois Supreme Court Rule 216(c)(1) and as set forth in Plaintiff's sworn statement attached as **Exhibit A**, Plaintiff cannot truthfully admit or deny this request beyond stating that Plaintiff reasonably believes that the amount in controversy will exceed the jurisdictional limit of the Law Division of the Circuit Court of Cook County. Beyond that, Plaintiff cannot affirmatively state at this early juncture of the litigation and without the benefit of pretrial discovery what the contours of the litigation will be and what monetary damages will ultimately be sought and, thus, what the amount in controversy will be.

**EXHIBIT
D**

4. Admit that the damages actually sought by you for the injuries alleged in your complaint in this matter exceed seventy-five thousand dollars (\$75,000), exclusive of interest and costs.

RESPONSE: Pursuant to Illinois Supreme Court Rule 216(c)(1) and as set forth in Plaintiff's sworn statement attached as **Exhibit A**, Plaintiff cannot truthfully admit or deny this request beyond stating that Plaintiff reasonably believes that the amount in controversy will exceed the jurisdictional limit of the Law Division of the Circuit Court of Cook County. Beyond that, Plaintiff cannot affirmatively state at this early juncture of the litigation and without the benefit of pretrial discovery what the contours of the litigation will be and what monetary damages will ultimately be sought.

Respectfully submitted,

SALVI, SCHOSTOK & PRITCHARD, P.C.

By: /s/ Lance D. Northcutt

Attorney for Plaintiffs

Lance D. Northcutt (ARDC# 6278144)
Jennifer M. Cascio (ARDC# 6325256)
Emily T. Art (ARDC# 6345559)
SALVI, SCHOSTOK & PRITCHARD P.C.
161 N. Clark St., Suite 4700
Chicago, IL 60601
Phone: (312) 372-1227
Fax: (312) 372-3720
lnorthcutt@salvilaw.com
jcascio@salvilaw.com
eart@salvilaw.com
Firm No. 34560

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 FRONTIER AIRLINES,)
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 Defendants.))

AFFIDAVIT OF PLAINTIFF SHANNON O'BRIEN

I, Shannon O'Brien, being first duly sworn upon oath, hereby affirm and state as follows:

1. My name is Shannan O'Brien. I am the Plaintiff in the above captioned case.
2. I am a citizen of the state of Illinois.
3. I am domiciled in the state of Illinois.
4. I reasonably believe that the amount in controversy will exceed the jurisdictional

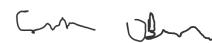
limit of the Law Division of the Circuit Court of Cook County.

5. I cannot affirmatively state at this stage of litigation whether the amount in controversy in this case exceeds seventy-five thousand dollars (\$75,000.00). Any decision as to whether an amount that exceeds \$75,000.00 will be made as I learn more information about the case and after consultation with my attorneys.

Under penalties as provided by law pursuant to Section 1-109 of the Code of Civil Procedure, the undersigned certifies that the statements set forth in this affidavit are true and correct, except as to matters therein stated to be on information and belief and as to such matters the undersigned certifies as aforesaid that I verily believe the same to be true.

FURTHER AFFIANT SAYETH NAUGHT

Executed on January 16, 2024



SHANNON O'BRIEN

EXHIBIT
A